

**United States District Court
Western District of Louisiana
Lafayette Division**

Kathy Kocurek *et al.*

Civil Action No.: 6:16-cv-00543

Versus

Judge Foote

Frank's International, LLC *et al.*

Magistrate Judge Hanna

**Defendants' Motion to Strike the
"Amendment" of Le Chat Interiors, Inc.'s Deposition Testimony**

Defendants, Frank's International, LLC ("Frank's") and Gary Luquette ("Mr. Luquette") (collectively, "Defendants"), move to strike the "Amendment" of Le Chat Interiors, Inc.'s Deposition Testimony [Rec. Doc. 54-7].¹


In opposing Defendants' Motion for Summary Judgment [Rec. Doc. 47 *et seq.*], Plaintiffs, Kathy Kocurek ("Ms. Kocurek") and Le Chat Interiors, Inc. ("Le Chat") (collectively, "Plaintiffs"), have offered several purported "changes" to the deposition testimony of Le Chat, through Ms. Kocurek as its corporate representative, including the outright deletion of approximately five (5) pages of unfavorable testimony cited in support of Defendants' Motion for Summary Judgment. This Court should strike the "Amendment" because Plaintiffs' proposed alterations and deletions undermine the discovery process and purpose of Rule 30(e) of the Federal Rules of Civil Procedure.

WHEREFORE, Defendants, Frank's International, LLC and Gary Luquette, pray that their Motion to Strike "Amendment" of Le Chat Interiors, Inc.'s Deposition Testimony is granted and that Rec. Doc. 54-7, pp. 4–9 ("Exhibit G") be stricken from the record and from consideration with Defendants' pending Motion for Summary Judgment.

¹ In the alternative, Defendants couch this motion as a Motion in Limine to Exclude the "Amendment" of Le Chat's Deposition Testimony from consideration with Defendants' Motion for Summary Judgment.

Respectfully submitted,

NEUNERPATE

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**Counsel for Defendants, Frank's
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Certificate of Service

I HEREBY CERTIFY that, on May 18, 2017, a copy of the foregoing has been served on all counsel of record in this proceeding by:

- | | |
|--|---|
| <input type="checkbox"/> Hand delivery | <input type="checkbox"/> Prepaid U. S. Mail |
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| <input type="checkbox"/> Certified Mail/Return Receipt Requested | <input checked="" type="checkbox"/> CM/ECF |



Counsel